

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

RENEE BARNAUSKAS,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Cause No. 3:17-cv-02167-RPC
	)	
SYNCHRONY BANK and GENPACT SERVICES,	)	Hon. Richard P. Conaboy
LLC,	)	
	)	
Defendants.	)	

**DEFENDANTS' JOINT UNOPPOSED MOTION TO COMPEL ARBITRATION  
AND TO STAY THE ACTION**

Defendants Synchrony Bank and Genpact Services, LLC (“Defendants”) pursuant to Federal Rule of Civil Procedure 12(b)(1), Sections 3 and 4 of the Federal Arbitration Act (“FAA”), 9 U.S.C. §§ 1-16 (“FAA”), and Local Rule 7.5 hereby submits their Joint Unopposed Motion to (a) compel Plaintiff Renee Barnauskas (“Plaintiff”) to submit her claims against all Defendants to arbitration and (b) stay the action while arbitration proceeds. In support of the Motion, Defendants state as follows:

1. Plaintiff is the holder of a Rewards of Sport, *f.k.a.* Dick’s Sporting Goods credit card which is assigned an Account number ending in 2366 (the “Account”).

2. The Account is governed by the terms and conditions of the operative Account Agreement, which includes a mandatory arbitration provision for resolving disputes or claims between Defendants and Plaintiff regarding any dispute relating to the Account (the “Account Agreement”). *See* the Account Agreement, attached hereto and collectively marked as Exhibit A.

3. Defendants respectfully requests that the Court (a) grant this Motion, (b) compel Plaintiff to submit her claims to arbitration, and (c) stay this action pending the outcome of the arbitration.

4. Prior to the filing of this motion, counsel for Defendants contacted Plaintiff's counsel and conferred on this relief sought herein. Plaintiff's counsel indicated that Plaintiff is not opposed to the relief sought herein.

**WHEREFORE**, Defendants Synchrony Bank and Genpact Services, LLC respectfully requests that the Court enter the attached Order:

(a) granting this Motion,

(b) compelling Plaintiff to submit her claims to arbitration, and

(c) staying this action pending the outcome of the arbitration.

DATED: January 12, 2018

Respectfully submitted,

/s/ Jack P. Bock, III.

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*Attorneys for Defendant  
Genpact Services, LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 12<sup>th</sup> day of January, 2018, I caused the foregoing to be electronically filed with the Clerk of the Court by using CM/ECF system, which will send a notice of electronic filing to counsel of record.

/s/ Jack P. Bock, III.  
Jack P. Bock, III, Esq.  
Bar Number PA 201758